

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CURTIS M. COLLINS,)
)
 Plaintiff,)
)
 v.) Civ. No. 05-739-SLR
)
 WARDEN RICK KEARNEY, et al.,)
)
 Defendants.)

CERTIFICATION

At Wilmington this 5th day of November, 2006;

I, Nancy Rebeschini, Esquire, pro se law clerk, and designated officer for depositions upon written questions held before me on November 8, 2006, do here by certify that:

1. The deposition of Bradley Berezansky was held on November 8, 2006, at 9:30 a.m., at the J. Caleb Boggs Federal Building, Wilmington, Delaware.

2. On that same date, Bradley Berezansky declared before me, an individual authorized to administer oaths, that his written answers were true and correct.

3. I read aloud each and every deposition question submitted by plaintiff, Curtis M. Collins, for deponent, Bradley Berezansky.

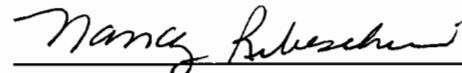
4. I personally observed deponent, Bradley Berezansky, answer in writing, the deposition questions.

5. A true and correct copy of the written questions filed by plaintiff, the original written answers of deponent, and

written original objections made by his counsel are attached hereto and are filed with the court, and copies shall be served upon the parties and the deponents.

I, Nancy Rebeschini, certify under penalty of perjury that the foregoing is true and correct.


Executed this 9th day of November, 2006.



Nancy Rebeschini, Esquire,
Designated Officer

CERTIFICATE OF SERVICE

I hereby certify that on November ⁹, 2006, I caused to be electronically filed the attached Certification with the Clerk of the Court using CM/ECF, which will send notification of such filing to Erika Yvonne Tross, Esquire, counsel for defendants. I further certify I caused a true and correct copy of the attached Certification to be served via U.S. mail on plaintiff, Curtis M. Collins, SBI #314128, Delaware Correctional Center, SHU 17-DL-2, 1181 Paddock Road, Smyrna, DE 19977.


Nancy Rebeschini, Esquire,
Designated Officer

C/O BEREZANSKY

1*

IS IT TRUE THAT YOU "HAVE A HISTORY" OF
CAPSTUNTING INMATES BEFORE AND
AFTER THEY ARE "HANDCUFFED AT S.C.I. PRISON

#2

IS IT TRUE THAT 90% OF YOUR DISCIPLINARY
REPORTS ON INMATES ACCURE "AT CHOW TIME"
FEEDING THE INMATES AT S.C.I. PRISON

#3

WORKING AS A CORRECTIONAL OFFICER FOR
THE ~~STATE~~ STATE OF DELAWARE HAVE YOU EVER
BEEN PLACED ON LEAVE DURING ANY
INVESTIGATION CONCERNING ABUSE IN INMATE
AT S.C.I. PRISON.

#4

WORKING AS A CORRECTIONAL OFFICER FOR THE
STATE OF "DELAWARE" HAVE YOU BEEN SUED
BY AN "INMATES AT S.C.I. ACCUSING YOU OF
ABUSE OR THREATENING BEHAVIOR, IF SO
COULD YOU PLEASE STATE FOR THE RECORD HOW MANY
MEANY TIMES YOU BEEN SUED OR ACCUSED
OF INMATES ABUSE OF ANY OTHER THREATENING
BEHAVIORS BY INMATES HOUSED AT S.C.I. PRISON.

5*

IS IT TRUE THAT 82% PERCENT OF YOU
DISCIPLINARY REPORTS FILED ON INMATES
ARE AFRICAN AMERICAN "INMATES AT
S.C.I. PRISON

#6# 90 BEREZANSKY

IS IT TRUE THAT OUT OF 90% PERCENT!
OF YOUR INMATES ARE "WITH" AFRICAN
AMERICAN "INMATES" RESOLVES" IN THEM
BEING ASSAULTED" BY YOU CAPSTON! BY YOU
BEFORE AND AFTER" THE INMATES ARE ALREADY
IN HANDCUFFS.

#7# SO

CAN YOU PLEASE TELL THE "COURTS WHY YOU
RAN ^{AT} MR. COLLINS IN THE CHOW HALL AND"
ASSAULTED MR. COLLINS BY PUNCHING MR. COLLINS
IN THE FACE IN FRONT OF A BUNCH OF OTHER
INMATES IN THE S.C.I. CHOW HALL

#8

IS IT TRUE THAT YOUR JOB IS TO BE A
PROFESSIONAL OFFICER'S

#9

WELL CAN YOU PLEASE TELL THE COURTS
WHY YOU USED PROFANITY ALL THE TIMES
WHEN TALKING TO INMATES


#10#

HAVE YOU EVER BEEN ASSAULTED OR ABUSED
IN THE PAST BY AN AFRICAN AMERICAN
MALE" WHILE YOU WERE OUT OF UNIFORM
OR IN UNIFORM.

c/o Bradley Berezansky

11/09/06

- 1) No
- 2) No
- 3) No
- 4) Yes, once
- 5) I don't know! I don't keep track.
- 6) No
- 7) I was approached by you not the other way around. You lunged at me and were capstunned and taken to the ground and cuffed.
- 8) Yes
- 9) I don't use profanity all the time(s) while talking to inmates.
- 10) No

Bradley S. Berezansky


Deposition of Bradley Berezansky

11/8/06

Objections:

1. Objection - Irrelevant
2. Objection - Irrelevant
3. No objection
4. Objection - Compound + Irrelevant
5. Objection - Irrelevant
6. Objection - Form
7. No objection
8. No objection
9. Objection - Form
10. Objection - Irrelevant

Erika Y. Trov (#4506)
Erika Y. Trov